

BUREAU OF LAND MANAGEMENT (BLM) SUPPLEMENT TO THE INTERAGENCY PRESCRIBED FIRE PLANNING AND IMPLEMENTATION GUIDE

Management Responsibilities Related to Prescribed Fire

Existing delegations (910 DM 1.2) from the Secretary of the Interior to the Director of the BLM provide for the operation of the Fire Management Program, including prescribed fire.

1. The BLM Director is responsible for developing policy guidance for the use of prescribed fire.
2. The Director, Office of Fire and Aviation (OF&A), is delegated the responsibility for overall policy and guidance for prescribed fire management activities. These responsibilities include:
 - a. Establishing prescribed fire planning and fiscal guidance.
 - b. Establishing prescribed fire operational guidance.
 - c. Establishing prescribed fire personnel qualifications.
 - d. Establishing prescribed fire reporting procedures.
 - e. Establishing prescribed fire review criteria and procedures.
 - f. Establishing prescribed fire effects monitoring guidelines.
 - g. Providing assistance to BLM states, including smoke management, fire effects, equipment development, planning and implementation.
 - h. Participating in national level smoke management and air quality programs.
 - i. Reviewing and/or investigating escaped prescribed fires.
3. The Assistant Director for Renewable Resources and Planning is responsible for establishing resource planning, National Environmental Policy Act (NEPA) compliance and monitoring standards for prescribed fire activities.
4. State Directors are responsible for developing, implementing, and evaluating prescribed fire operations. Each State Director will:
 - a. Develop additional guidelines as needed for the planning, implementation, monitoring, reporting, and evaluation of prescribed fire activities.

- b. Approve Prescribed Fire Plans. Authority may be delegated to the Agency Administrators (not specific offices) as provided under the BLM Manual Section 1203 – Delegation of Authority.
- c. Review/investigate escaped prescribed fires.
- d. Ensure that prescribed fires which receive a National Ambient Air Quality Standards (NAAQS) Notice of Violation (NOV) are reviewed according to established guidelines
- e. Incorporate prescribed fire into geographic and local area preparedness plans.
- f. Ensure participation in state level smoke management programs.
- g. Perform periodic program review to assure compliance with National and State BLM standards.
- h. Ensure that only trained and qualified personnel participate in the implementation portion of the prescribed fire program.

Prescribed Fire Planning and Implementation

Changes and additions to BLM's Prescribed Fire Planning and Implementation Policy are identified below. Reference the Interagency Prescribed Fire Planning and Implementation Guide (RX Fire Guide) and utilize the following to determine changes to existing policy and/or additional BLM policy requirements for planning and implementing prescribed fires. State Offices may choose to provide more restrictive standards and policy direction, but must adhere to the **minimums** required in the IA RX Fire Guide and the additional BLM requirements identified in this document.

Prescribed Fire Plan Technical Review/Technical Reviewer:

BLM Additional Requirements to the RX Fire Guide: Offices that develop their own Prescribed Fire Plans and complete their own technical reviews will ensure that a percentage (a minimum of one per district per year) of the Prescribed Fire Plans are technically reviewed by a qualified individual from outside of the office.

Element 1 Signature Page:

BLM Additional Requirements to the RX Fire Guide:

- The District or Field Office Fire Management Officer (FMO) will review and sign all BLM developed Prescribed Fire Plans, and multi agency plans that will be implemented by BLM. An FMO signature line will be inserted into the Prescribed Fire Plan Template below the technical review signature.

Element 7 Prescription:

BLM Additional Requirements to the RX Fire Guide: **At a minimum**, a description for rate of spread and flame length **will** be developed utilizing a standard fire behavior prediction system or empirical evidence.

Element 9 Pre-Burn Considerations:

BLM Additional Requirements to the RX Fire Guide: Prior to implementing the prescribed fire, the responsible dispatch office **will** be given a complete copy (printed or electronically) of the Prescribed Fire Plan.

Pre-burn briefings will include a discussion of the risks identified in the Risk Assessment Worksheet attached to the appendix as developed in element 13

Element 13 Public and personnel Safety, Medical:

BLM Additional Requirements to the RX Fire Guide: The BLM Risk Management Process will be used in place of the Job Hazard Analysis. The Risk Assessment worksheets will be attached as 'appendix D' to the prescribed fire plan.

Element 16 Holding Plan:

BLM Additional Requirements to the RX Fire Guide: The mop-up and patrol portion of the Holding Plan will provide a general description of the procedures to be implemented between the time of ignition and the time the prescribed fire is declared out. The prescribed fire burn boss will determine resource needs for mop up based on current and expected fire behavior and weather.

Element 17 Contingency Planning:

BLM Additional Requirements to the RX Fire Guide: Ranges of resources needed and response times may be identified. If no contingency resources are required, other than those identified and utilized in the Holding Plan, a statement documenting this fact will be included. In all contingency planning the duration that contingency resources are needed will be documented. Also, see Element 18, Wildfire Conversion.

Element 18 Wildfire Conversion:

BLM Additional Requirements to the RX Fire Guide:

- When a prescribed fire is declared a wildland fire, managers still have the full range of fire management options available under the concept of appropriate management response. If a prescribed fire is declared a wildland fire, a wildfire number will be assigned and all wildfire management costs will be charged to that number.
- In addition to the RX Fire Guide directions, the following actions will be taken by designated staff on all BLM prescribed fires that are declared wildland fires.
 - a. The BLM Agency Administrator responsible for the area **will** be notified by the RXB or FMO.
 - b. Take the appropriate management response with any prescribed fire that has been declared a wildfire. Contingency plans should be developed to identify critical values at risk, actions and resources needed, and other information necessary that may be utilized as an aid to determine and implement initial response actions when a wildfire is declared.
 - c. Notify any other Agency Administrators and/or landowners who may be affected (FMO, Resource Advisor, Dispatch). Coordinate fire management actions with Incident Commanders, FMOs, and other affected parties.

Since all prescribed fires are planned management actions, a prescribed fire that is declared a wildfire that burns onto non-Federal lands may lead to tort claims and liability issues. The instructions contained in the BLM Manual, Section 1386 – Claims, should be followed. Special attention to documentation is critical.

Element 20 Monitoring:

BLM Additional Requirements to the RX Fire Guide:

- A Monitoring Plan is required for first order fire effects at a minimum. The plan will describe what data will be collected, when it will be collected, where on the prescribed fire site it will be collected, which methods will be used for each data element, and list the personnel responsible for collecting the data.
- The minimum requirements established for prescribed fire monitoring include weather during the fire, observed fire behavior, smoke dispersal and if fire treatment objectives have been met.
- Prescribed fire funds can be used for monitoring treatment objectives. Treatment objectives and long term fire effects monitoring must be coordinated with the resource(s) benefiting from the prescribed fire treatment. The resource(s) benefiting from the prescribed fire treatment should fund the long term fire effects monitoring.

Element 21 Post Burn Activities:

BLM Additional Requirements to the RX Fire Guide:

- Prescribed Fire Report: A post burn evaluation and summary that documents burn day weather, fuel conditions, fire behavior, problems and concerns is required. The report must also indicate if objectives were met and make recommendations for future projects. The prescribed fire results must be compared to the fire treatment objectives and resource objectives that were identified for the project. The prescribed fire report must be completed and signed by the RXB and retained as part of the prescribed fire project file.
- National Fire Plan Operations Reporting System (NFPORS): All prescribed fire projects will be reported in NFPORS within 5 days after being declared out. When accomplishments are completed across fiscal years only those accomplishments completed in that fiscal year will be recorded.
- All prescribed fire accomplishments must be reported in the BLM Management Information System (MIS) within the fiscal year quarter in which they occurred.

Qualifications:

BLM Additional Requirements to the RX Fire Guide: The BLM has additional requirements for some prescribed fire positions. The qualifications for each position are shown in the chart below. All BLM personnel assigned to prescribed fire operations will meet the minimum qualifications outlined in this section. This will include BLM personnel assigned to assist other agencies.

Bold print represents BLM additional positions and requirements.

Position	Qualified As	Required Training	Suggested Training	Physical Fitness	Position Taskbook
RXM1	RXB1	None		None	Required
RXM2	RXB2	None		None	Required
RXB1	RXB2 + ICT3	S-490 RX-410	RX-510 RX-410 M581 M-580 RX341*	Light	Required
RXB2	FIRB + ICT4	S-390 RX-301(300)* BEHAVE**	RX-410 M581 I300 RX341*	Moderate	Required
RXB3	ICT5	S-290	S-234 L-280 RX-341	Moderate	None
Prescribed Fire Holding Specialist	Appropriate ICS Qualification				
FIRL	FIRB + STL or TFLD or RXB2	S-390	RX310 RX301 RX410 Aerial ignition devices	Moderate	Required
FIRB	Single Resource FFT1	S-290 S-230 S-234	L-280 S-260 S-270	Moderate	Required
FEMO	FFT2	S-290 RX-310	S-244	Arduous	Required
Prescribed Fire Plan Preparer	RXB1/ RXB2***			None	None
Prescribed Fire Technical Reviewer	RXB1/ RXB2***			None	None
Agency Administrator	N/A	Fire Mgmt. Leadership/		N/A	N/A

* RX301 and 341 will become NWCG published courses in 2009. RX301 will replace RX300. RXB2 trainees must complete the new RX301 course if they have begun work on or finished an RXB2 taskbook but have not taken the RX300 course or are not scheduled to take the RX300 course in 2009.

**BEHAVE is a self taught course, individuals must demonstrate efficiency in utilizing BEHAVE to prepare and review prescriptions.

*** Less currency or current depending on currency of other reviewer/preparer qualifications (see Interagency Prescribed Fire Planning and Implementation Procedures Guide 2008)

The table below identifies the position requirements for prescribed fire ignition operations when the position is assigned by the prescribed fire plan. The requirements are based on levels of complexity or type/number of resources assigned to the prescribed fire.

POSITION	COMPLEXITY		TYPE/NUMBER OF RESOURCES ASSIGNED
FIRL	Prescribed fire high complexity	With	Simultaneous multiple air and ground ignition firing resources/types
FIRB	Prescribed fire low and moderate complexity	With	Single Air and/or single ground ignition firing resource/type

FIRB to BLM FIRB

Current FIRB qualified employees must complete the BLM additional training (S-234) and achieve the arduous physical fitness rating to qualify as a BLM FIRB. Current FIRB trainees must complete the BLM additional training and achieve the arduous physical fitness rating to qualify as a BLM FIRB.

BLM FIRB to FIRL

If all the current FIRB PTB elements, prerequisite qualifications (STL or TFLD or RXB2), and training (S234 and S390) of current FIRBs have been completed in the past then a FIRL PTB will be completed to qualify as a FIRL. However, if the employee and local Red Card Committee are satisfied with the employee's experience, skills and competencies involving high complexity ignition operations then the FIRL position can be awarded.

The BLM will accept other agency personnel FIRB qualifications for firing or ignition operations on BLM prescribed fires.

Contractor/Cooperator Plan Development and Implementation:

BLM Additional Requirements to the RX Fire Guide:

- The BLM will provide the technical review for contractor or cooperator written plans developed for BLM.
- If a contractor is actively involved in igniting, holding or mopping up a BLM prescribed fire, a Contracting Officers Representative (COR) or Project Inspector (PI) will be on site (exceptions can be made for mop up and patrol) to ensure that the burn objectives are being met and that the terms of the contract are followed.
- The BLM representative (COR or PI) must have at a minimum wildland fire qualifications at the BLM FIRB level.

Reviews:

BLM Additional Requirements to the RX Fire Guide: Levels and responsibilities for administrative reviews when prescribed fires are declared a wildfire:

1. Fire Management Officer. The District or field Office FMO is required to investigate all prescribed fires declared a wildfire, either personally or through an appropriate designated investigator.
2. Agency Administrator. The Agency Administrator is responsible for ensuring adequate and proper investigation of all prescribed fires that are declared a wildfire. The Agency Administrator may appoint an investigation team or request that one be appointed consistent with Manual Section 1112 - Safety, paragraph .22D, Accident Investigations.

The Agency Administrator will notify the State Fire Management Officer (SFMO) and the State Director of the wildfire declaration.

3. State Director. State Directors are responsible for ensuring adequate, proper investigation of all prescribed fires declared a wildfire which result in serious or multiple personal injuries, significant burned area on private or other agency lands, or an estimated expenditure of up to \$250,000 for suppression and/or property damage.

The State Director will notify the Assistant Director, Fire and Aviation Directorate (WO400), if the above criteria was met within 24 hours. Copies of the completed review report will be sent to the Assistant Director, Fire and Aviation Directorate.

BLM Assistant Director, Fire and Aviation Directorate (WO-400) is responsible for ensuring adequate and proper investigation of all prescribed fires declared a wildfire which result in fatality, injuries to people not involved in the prescribed fire operation, fire shelter deployment, a major transportation route closure, smoke significantly impacting a major population center or causing a public health concern, or where suppression expenditures and/or property damage exceed \$250,000. The scope of the review will be determined by factors such as extent or type of injuries sustained, property damage and smoke issues associated with the declared wildfire. The RX Fire Guide describes 7 elements that will be addressed at a minimum (see RX Fire Guide; Reviews chapter, page 29)

Escape Prescribed Fire Reports

If a prescribed fire is declared a wildland fire, two fire reports are required. The acreage burned while a prescribed fire would be reported in NFPORS and Management Information System (MIS) as prescribed fire acreage using the prescribed fire number. Acreage burned after the fire was declared a wildland fire would be reported as wildfire acreage in the BLM Fire Reporting System (1202) using the local fire number.